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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

EVAN WOOTEN, individually and on behalf
all others similarly situated,

Plaintiff,

vs.

BIOLIFE PLASMA SERVICES L.P. and
TAKEDA PHARMACEUTICALS U.S.A., INC.

Defendants.

Case No. 1:25-cv-00099-KES-SKO

**JOINT STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S DEADLINE TO
FILE FIRST AMENDED COMPLAINT
AND SETTING BRIEFING SCHEDULE**

(Doc. 15)

Hon. Kirk E. Sherriff

Pursuant to Civil L.R. 143, Plaintiff Evan Wooten and Defendants BioLife Plasma Services L.P. and Takeda Pharmaceuticals U.S.A., Inc. (the “Parties”), respectfully submit the following joint stipulation to extend Plaintiff’s deadline to file a First Amended Class Action Complaint and Setting a Briefing Schedule.

STIPULATION

WHEREAS, Plaintiff filed the operative Complaint on January 22, 2025 (ECF No. 1);

WHEREAS, on April 4, 2025, Defendants moved to dismiss Plaintiff’s Complaint, triggering Plaintiff’s deadline of April 18, 2025 to file an opposition or an amended complaint (ECF No. 13) (Civil L.R. 230(c));

WHEREAS, during the Parties’ meet and confer prior to the filing of the Motion to Dismiss, Plaintiff informed Defendants that he would be amending the complaint as of right pursuant to Fed. R. Civ. P. 15(a)(1)(B);

WHEREAS, the deadline for Plaintiff to respond to the Motion to Dismiss falls before Plaintiff’s deadline to amend as of right, and Plaintiff requires additional time to evaluate the arguments in Defendants’ Motion and properly address them in an amended complaint;

WHEREAS, should Defendants move to dismiss Plaintiff’s First Amended Complaint, the Parties desire to set a briefing schedule for that motion;

WHEREAS, this request is made in good faith and not for the purpose of unnecessary delay;

NOWWHEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES THAT, subject to the Court’s approval,

- Plaintiff shall file a First Amended Complaint or otherwise respond to the Motion to Dismiss shall be **May 9, 2025**;
- Defendants shall answer or otherwise respond to the First Amended Complaint by **June 6, 2025**;
- Should Defendants file a Motion to Dismiss the First Amended Complaint, Plaintiff shall file his Opposition by **July 7, 2025**;
- Should Defendants file a Motion to Dismiss the First Amended Complaint, Defendants shall file their Reply by **July 24, 2025**.

1 Dated: April 15, 2025

Respectfully submitted,

2 **BURSOR & FISHER, P.A.**

3 By: /s/ L. Timothy Fisher

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10 Dated: April 11, 2025

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*Attorneys for Defendants BioLife Plasma
Services L.P. and Takeda Pharmaceuticals
U.S.A., Inc.*

ORDER

Pursuant to the parties' foregoing Joint Stipulation (Doc. 15), and for good cause shown, the Court hereby orders that Plaintiff SHALL file a First Amended Class Action Complaint on **May 9, 2025**. Defendants SHALL file a response on **June 6, 2025**. Should Defendants file a Motion to Dismiss the First Amended Complaint, Plaintiff SHALL file his Opposition by **July 7, 2025**. Should Defendants file a Motion to Dismiss the First Amended Complaint, Defendants SHALL file their Reply by **July 24, 2025**.

IT IS SO ORDERED.

Dated: **April 15, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE